

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

<b>Hunter J. Garrett,</b>	:	
<b>Plaintiff</b>	:	<b>Case No. 2:19-cv-2227</b>
<b>v.</b>	:	
<b>Opportunities for Ohioans with Disabilities, et al.</b>	:	<b>Chief Magistrate Judge: Elizabeth A. Preston Deavers</b>
<b>Defendants</b>	:	

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**MOTION FOR BILL OF COSTS**

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Pursuant to the Opinion and Order of this Court (ECF No. 69), Federal Rule of Civil Procedure 54(d)(1) and Local Rule 54.1, Plaintiff asks this Court to award costs in this case. Form AO 133 detailing the costs in this case, a declaration supporting the requested costs, and invoices are all attached as exhibits. A memorandum in support is below.

Respectfully Submitted,

s/ Kristin Hildebrant  
Kristin Hildebrant (0042086)  
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Trial Attorney  
Disability Rights Ohio  
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Counsel for Plaintiff

**MEMORANDUM IN SUPPORT**

Plaintiff seeks only the costs associated with the fees of the Court and two depositions, Director of the Kelly Autism Program Michelle L. Elkins and Opportunities for Ohioans with Disabilities Vocational Rehabilitation Supervisor Japiya Burns. *See* Exhibit 1 – Declaration of Kristin Hildebrant; Exhibit 2 – Form AO 133; Exhibit 3 – Invoices.

Plaintiff's deposition of Director of the Kelly Autism Program Michelle L. Elkins was appropriate for the purposes of this case as it was ordered by the Court in response to Plaintiff's motion. Opinion and Order (ECF No. 25). Plaintiffs are seeking payment for costs solely related to the deposition. *See* Exhibit 3 – Invoices. Defendants conducted the deposition of Japiya Burns and Plaintiff sought only a transcript of the proceedings. *Id.* at 3-4.

<b>Description</b>	<b>Subtotal</b>	<b>Total</b>
Fees of the Clerk	Filing Fee \$400.00	\$400.00
Fees for printed or electronically recorded transcripts necessarily obtained for use in the case	Michelle L Elkins Deposition <ul style="list-style-type: none"> <li>• Pages \$947.10</li> <li>• Scan/Xerox/Archive \$103.50</li> <li>• Electronic File Formats/Archivals \$55.00</li> <li>• Signature/Certified Letter and Affidavits \$40.00</li> </ul> Japiya Burns <ul style="list-style-type: none"> <li>• Day 1 \$576.45</li> <li>• Day 2 \$163.80</li> </ul>	\$1885.85
Other costs	Michelle L Elkins Deposition <ul style="list-style-type: none"> <li>• Hourly \$210.00</li> </ul>	\$682.50

	<ul style="list-style-type: none"><li>• Attendance (After Hours) \$135.00</li><li>• VC technician – Evening Rate \$112.50</li><li>• VC Technician \$175.00</li><li>• video recording \$50.00</li></ul>	
Total		\$2,968.35

Respectfully Submitted,

s/ Kristin Hildebrant  
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Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Motion for Bill of Costs for Plaintiff was filed electronically on September 7, 2022. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

s/ Kristin Hildebrant  
Kristin Hildebrant (0042086)